

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CHAUNA CRAWLEY, *et al.*

Plaintiffs,

v.

CAVALRY PORTFOLIO SERVICES, LLC, *et al.*

Defendants.

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Civil Action No. 3:12cv252

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR CONSENT
MOTION FOR AN EXTENSION OF TIME TO FILE THEIR
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS**

Plaintiffs, by counsel, with consent of the Defendant and pursuant to Fed. R. Civ. P. 6(b), respectfully move for an Extension of Time to File their Motion for an Award of Attorneys' Fees and Costs until October 17, 2012. Plaintiffs submit this Memorandum in support of their Motion.

The Defendants submitted an Offer of Judgment to each Plaintiff on September 20, 2012. Plaintiff Woodson accepted on September 20, 2012 and Plaintiff Crawley accepted on September 24, 2012. On September 26, 2012, the Court subsequently entered judgment against the Defendants in favor of each Plaintiff. Their Motion for an Award of Attorneys' Fees and Costs is now due on October 10, 2012, pursuant to Rule 54. The parties have been working to negotiate the same, and may reach an agreement without engaging in motions practice and expending unnecessary judicial resources or fees on both sides. Neither party will be prejudiced by a one-week extension, and the Defendants have consented to the extension.

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion, and extend their deadline to submit their fee petition on or before October 17, 2012 in the unlikely event that it becomes necessary for them to do so.

Respectfully submitted,
CHAUNA CRAWLEY and
BARBARA WOODSON

By _____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of October, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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